

# EXHIBIT 22

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ELLEN GERHART, ELISE	:	
GERHART, ALEX LOTORTO	:	
and ELIZABETH GLUNT,	:	
Plaintiffs and	:	CIVIL ACTION NO. 1:17-cv-1726-YK
Counterclaim Defendant	:	
	:	
v.	:	
	:	
ENERGY TRANSFER	:	
PARTNERS, <i>et al.</i> ,	:	(Judge Kane)
Defendants and	:	
Counterclaimants	:	

**PLAINTIFFS' SECOND SET OF INTERROGATORIES  
DIRECTED TO DEFENDANT JOHNSON**

To: To: Nick Johnson  
c/o Christopher Gerber  
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**DEFINITIONS AND INSTRUCTIONS**

These requests incorporate by reference the definitions set forth in Plaintiff's First Set of Interrogatories and Requests for Production of Documents directed to you.

**INTERROGATORIES**

1. Describe in detail the agreement you referenced on pages 9 and 67-68 that you alleged bound you not to answer question "to the best of your knowledge were you in North Dakota in August of 2017," including but not

limited to when any such agreement was executed, any other parties to the agreement, the consideration for any such agreement, whether the agreement is with TigerSwan and/or Cedar Fork Partners, the period of time the agreement covers, and the specific terms of any such agreement.

ANSWER:

**WILLIAMS CEDAR**

/s/ CHRISTOPHER MARKOS

Christopher Markos, Esquire  
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One South Broad Street  
Suite 1510  
Philadelphia, PA 19107  
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**Attorney for Plaintiffs**

Dated: March 7, 2022

### **CERTIFICATE OF SERVICE**

I, Christopher Markos, certify that on the below date I served the foregoing document on all counsel of record via email.

/s/ CHRISTOPHER MARKOS

Christopher Markos, Esq.

Attorney for Plaintiffs

Dated: March 7, 2022